

Leonard Chemical
11.9

McNAIR LAW FIRM, P. A.
ATTORNEYS AND COUNSELORS AT LAW
NCNS TOWER
1301 GERVAIS STREET
POST OFFICE BOX 11390
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE (803) 799-9800
FAX (803) 799-9804

CHARLESTON OFFICE
140 EAST BAY STREET
POST OFFICE BOX 1431
CHARLESTON, S.C. 29402
TEL (803) 723-7831
FAX (803) 722-3227

GEORGETOWN OFFICE
1112 HIGHMARKET STREET
POST OFFICE DRAWER 459
GEORGETOWN, S.C. 29442
TEL (803) 546-6131
FAX (803) 546-7232

GEORGETOWN OFFICE
121 SCHEVEN STREET
POST OFFICE DRAWER 418
GEORGETOWN, S.C. 29442
TEL (803) 546-6102
FAX (803) 546-0086

RALEIGH OFFICE
ONE EXCHANGE PLAZA
SUITE 810
POST OFFICE BOX 2447
RALEIGH, N.C. 27602
TEL (919) 890-4180
FAX (919) 890-4180

GREENVILLE OFFICE
SUITE 1201
NCNS PLAZA
7 NORTH LAURENS STREET
GREENVILLE, S.C. 29601
TEL (803) 271-4840
FAX (803) 271-4018

HILTON HEAD ISLAND OFFICE
McNAIR LAW BUILDING
10 POPE AVENUE EXECUTIVE PARK
POST OFFICE DRAWER 7787
HILTON HEAD ISLAND, S.C. 29928
TEL (803) 785-3169
FAX (803) 785-3029

WASHINGTON OFFICE
SUITE 400
MADISON OFFICE BUILDING
1155 15TH STREET, N.W.
WASHINGTON, D.C. 20005
TEL (202) 658-3900
FAX (202) 658-5763

May 21, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Wayne Lee, Esquire
Assistant Regional Counsel
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

23 1990
EPA-CLERK
ATLANTA, GA.

Re: Leonard Chemical Company

Dear Wayne:

On behalf of Standard Chemical, this letter is in response to your request for information on the above-referenced site. The answers to your questions are:

1. James Potter, McNair Law Firm, P.A.
2. No response is necessary.
3. No response is necessary.
4. NCD990715062
5. Unknown.
6. Lawrence Leonard
7. Lawrence Leonard
8. Respondent used the site for hazardous and nonhazardous substances from 1-26-76 to 4-26-77. See attached Lawrence Leonard Record (Exhibit 1). Personnel at the company (who are no longer with the company) estimated the type and amount of hazardous and nonhazardous substances generated by the plant in 1975 through 1977 in Exhibit 2 and another list for 1973 to 1977 is provided

Wayne Lee, Esquire
May 21, 1990
Page Two

in Exhibit 3. In an interview with Lawrence Leonard in 1983, Lawrence Leonard indicated that all but three drums were sent directly to the Lancaster County Landfill (see Exhibit 4).

- (a) "Soapified oils, soaps, emulsions, nonhalogenated solvents." See Exhibit 1.
 - (b) N/A
 - (c) Substances were transferred to Leonard Chemical in 55 gallon drums.
 - (d) The Standard Chemical plant in Charlotte, North Carolina.
 - (e) 1976 through part of 1977.
 - (f) Based on Lawrence Leonard's Exhibit 1, 1116 drums. Based on Exhibit 4, the interview with Lawrence Leonard, only three 55 gallon drums were at the Leonard Chemical site.
9. The Leonard Chemical site is no longer used by Standard Chemical. The best record of chemical substances used during the relevant time period are Exhibits 2 and 3, which are attached.
10. No.

Please let me know if you have any questions on this response.

Sincerely,

McNair Law Firm, P.A.


James W. Potter

JWP:wwa

Standard Chemical Charlotte, N.C.

DATE	CHEMICAL	PICKED UP		TOTAL	RECYCLED	TOTAL	TOTAL
		55 GAL. DRUMS		GAL.	55 GAL. DRUMS	RECYCLED GALS.	DOLLARS
1-26-76	Removal of:		128	7040			10000
	Isoparified oils						
	Isopar Emulsions						
	Isobutyl acetate						
	Solvents						
6-18-76	" "		160	8800			75000
7-15-76	" "		64	3520			30000
7-22-76	" "		128	7040			60000
10-8-76	" "		96	5280			45000
10-15-76	" "		62	3410			30000
10-27-76	" "		31	1705			15000
11-24-76	" "		96	5280			45000
12-2-76	" "		64	3520			30000
2-9-77	" "		64	3520			30000
2-18-77	" "		31	1705			15000
3-1-77	" "		32	1760			15000
3-2-77	" "		32	1760			15000
3-21-77	" "		32	1760			15000
3-28-77	" "		32	1760			15000
4-15-77	" "		32	1760			15000
4-26-77	" "		32	1760			15000
			1116	61380			525000

EXHIBIT
 1

05/17/90

15:55

HENKEL HCO LEGAL

002



Henkel Corporation
INTRA-COMPANY
CORRESPONDENCE

Copy to

At

To Tom Dailey

At HCO/Law

JUN 07 1984

Vau-95-84

From Dennis J. Vaughn

At Corp Safety, HTC/MP15 (612-378-8562)

Date 12/6/84

Subject WASTE QUANTITIES - LEONARD SITE

Chatterton: JCV

The attached table contains a general breakdown of wastes disposed of from the Charlotte plant from March 21, 1975 to April 26, 1977. It is believed that most of these materials went to Leonard. This breakdown is based on listings and compositions provided by John Clark through his search of records.

Halogenated materials consisted of an estimated 1,692 pounds of halogenated solvent. The unknown materials, 1,121 pounds could also have been halogenated.

Based on estimates and unofficial results, I would guess that the contaminated soils contain from 100 to 400 gallons of halogenated materials. I would also guess that from 200 to 1,700 gallons of halogenated solvents are in the groundwater beneath the site. Consultants estimate 1,544 cubic yards of contaminated soils on-site and I estimate about 4,000,000 gallons of water under the site.

DJV/pd

[Signature]

cc: D. Chatterton/W. Person - HTC

D. Vaughn - HTC

File

CONFIDENTIAL
HENKEL CORPORATION

EXHIBIT

2

05/17/90

15:58

HENKEL HOD LEGAL

009

Henkel

Henkel Corporation

**INTRA-COMPANY
CORRESPONDENCE**

Copy to J. Spearman At
R. Tuck

To Dennis J. Vaughn At HTC

From John E. Clark At Charlotte

Date 2/18/83

Subject Discarded Stock (1973 to June 1977)

The above discarded stock, which was reported in the writer's memo dated 12/15/82, has been revised to show a generic chemical description for each product. For those products in which water was the major component, the second most important generic is also listed.

As previously mentioned those products with mineral oil were burned as fuel by the Leonard Chemical Co.

pgr



EXHIBIT
3

Vau-95-84
Page 2.

GENERAL MATERIAL CLASSIFICATION

DISPOSED 3-21-75 TO 4-26-77

<u>MATERIAL</u>	<u>POUNDS</u>	<u>%</u>	<u>MATERIAL</u>	<u>POUNDS</u>	<u>%</u>
water	139,193	27.4	halogenated solvent	1,692	0.3
mineral oil	100,982	20.0	sequestrant	1,595	0.3
amide	42,416	8.3	resin	1,582	0.3
ester	39,694	7.8	caustic	1,200	0.2
phosphate	36,340	7.2	zinc nitrate	1,170	0.2
soap	31,701	6.2	unknown	1,121	0.2
copolymer	18,487	3.6	amine	1,106	0.2
ethoxylates	18,396	3.6	acetate	940	0.2
starch	14,970	2.9	aluminum nitrate	900	0.2
sulfated oil	14,629	2.9	Varsol 18	797	0.2
glycols	9,714	1.9	chromium fluoride	780	0.2
sulfonate	5,238	1.0	resin emulsion	761	0.1
fatty acid	3,738	0.7	sulfate	700	0.1
polyethylene	3,568	0.7	copper chloride	680	0.1
butyl cellosolve	2,333	0.5	polybutene	561	0.1
sulfated ethoxylate	2,322	0.5	sodium silicate	450	0.1
alcohol	2,087	0.4	glycerin	434	0.1
zinc sulfate	1,985	0.4	anhydride	150	0.0
wax	1,844	0.4	polyphosphoric acid	35	0.0
ethoxylated alcohols	1,811	0.4	Total pounds approx.	508,000	

Discarded Stock (1973 to June 1977)

Discarded Stock for 1973

Avirol BOD 153	2,322 lbs.	Sulfated ethoxylate
----------------	------------	---------------------

Discarded Stock for 1975

March 1975

Butyl Stearate	8,478 lbs.	Ester (100%)
SCP 73	3,850 lbs.	Water (>78%), Polyethylene (8%)
Stantex 1032	<u>2,666 lbs.</u>	Mineral oil (>67%)
	14,994 lbs.	

April 1975

Stansoft 4092 910 lbs. Water (>81%), Amide (14.7%)

June 1975

Standafin 42	13,485 lbs.	Water (>40%), Starch (33.2%)
Stanfix A-9001	761 lbs.	Resin emulsion
Stantex Antifume #1	<u>471 lbs.</u>	Water (>75%), Copolymer (14.8%)
	14,717 lbs.	

September 1975

Stantex X-1060 Soap	10,740 lbs.	Biodegradable soap (100%)
Stantex 405-T	2,000 lbs.	Mineral oil (88%)
Stantex G-15	359 lbs.	Mineral oil (90%)
Stantex No Odor Lub #2	700 lbs.	Mineral oil (>70%)
A-1 (Ester 673-C)	1,600 lbs.	Ester (100%)
Stantex 581	12,619 lbs.	Mineral oil (>69%), Ethoxylates (>10%)
Stantex 712 CM	4,900 lbs.	Water (68%), Glycols (25%)
Pyrotex 271 DF	15,501 lbs.	Amide (33.9%), Water (>27%)
Pine Penetrant UBA-1	7,650 lbs.	Water (>41%), Sulfated oil (26%)
P-13 (Monoethanolamine)	3,120 lbs.	Amine (100%)
Stanquest 80	500 lbs.	Sequestrant
Stantex WE-567	6,500 lbs.	Water (>79%), Mineral oil (10%)
	<u>66,189 lbs.</u>	

October 1975

Phosphoric anhydride	150 lbs.	Anhydride (100%)
Stanax 1166	7,130 lbs.	Copolymer
Stantex 466-A	2,765 lbs.	Copolymer (55%), Ester (45%)
	10,045 lbs.	

December 1975

Standafin 840	1,775 lbs.	Water (>73%), Polyethylene (6.2%)
Pyrotex 121	401 lbs.	Water (62%), Amide (20.2%)
Standapon 102	1,460 lbs.	Ethoxylate (100%)
Standye Car Jet	140 lbs.	Halogenated solvent (47.8%), Ester (23.5%)
Standafin 612	2,125 lbs.	Water (77%), Amide (20%)
Stantex 736	439 lbs.	Amide (52.5%), Ethoxylate (19.4%)
Stansoft 4186	1,100 lbs.	Water (71%), Ester (13%)
Stantex Fabric Softener	1,400 lbs.	Amide (>90%)
Stantex Ny-White JM	163 lbs.	Glycols (68%), Ester (22.7%)
Standafin 42	10,117 lbs.	Water (>40%), Starch (33%)
Stantex X-1060 Soap	5,223 lbs.	Biodegradable soap (100%)
Fiber Finish Soap	7,895 lbs.	Biodegradable soap (100%)
Stantex KBM	9,200 lbs.	Sulfated oil (43%), Water (>36%)
Stantex Antistat 3-121-F	5,500 lbs.	Phosphate (100%)
Aluminum Acetate	940 lbs.	Acetate (100%)
A-94 (Pelargonic Acid)	1,395 lbs.	Fatty acid (100%)
T-18 (Lecithin)	1,911 lbs.	Ester (100%)
C-6 (Aluminum Nitrate)	900 lbs.	Nitrate (100%)
Softener 64	400 lbs.	Amide (100%)
T-13 (White Fonoline)	270 lbs.	Mineral oil (100%)
G-5 (Dipropylene Glycol)	126 lbs.	Glycol (100%)
P-2 (Monoisopropylamine)	427 lbs.	Amine (100%)
Sodium Silicate C-25	450 lbs.	Silicate (100%)
A-69 (Petronate L)	841 lbs.	Sulfonate (100%)
A-77 (Methyl Stearate)	170 lbs.	Ester (100%)
Isononyl Alcohol L-20	1,092 lbs.	Alcohol (100%)
Chromium Fluoride C-14	780 lbs.	Fluoride (100%)
C-12 (Copper Chloride)	680 lbs.	Chloride (100%)
Stansoft 4092	8,600 lbs.	Water (>81%)
Retardine D	10,978 lbs.	Water (65%), Sulfonate (35%)
Code NF 92 (2-ethylhexyl stearate)	400 lbs.	Ester (100%)
Stanscour 4054-A	3,693 lbs.	Butyl Cellosolve (46%), Ethoxylated Alcohol (26.8%)
Base DS	4,020 lbs.	Amide (91.3%)
Stanscour 4152	1,090 lbs.	Varsol 18 (57%), Ester (18%)
Stantex 108-B	4,161 lbs.	Water (50.6%), Ester (48.9%)
Stanscour 4168	2,686 lbs.	Water (66.4%), Ethoxylated Alcohol (13.4%)

Stantex AF
 Catalyst 101
 Stanscour 4170
 Mercetex 756
 Oil Concentrate 9-2
 Pyrotex 10 DF
 Standaphos P-4014
 Standapon P-4023
 Stanlev 4158
 Stansoft 4175
 Stantex Antifrost #1
 Stantex Weighter 31
 XC-1656
 Stantex 7147
 Stantex 7206
 Standafin 4082
 Standapon 105
 Stanset L
 Stanset S-5061
 Stantex 581 SS
 Stansoft 4066
 Stantex Antichaf 4114
 Stantex NA
 Stantex NSP-172A
 Stantex 1128
 Stantex FL-75
 Stanscour 4170
 Standapon P-4023
 Standafin 471
 Mercetex 756
 Stantex NA
 Sanforol NCF
 Stansoft 4175
 Pyrotex 10-DF
 Standye Car 260

1,155 lbs.
 3,096 lbs.
 200 lbs.
 225 lbs.
 98 lbs.
 210 lbs.
 1,624 lbs.
 80 lbs.
 1,429 lbs.
 974 lbs.
 910 lbs.
 1,985 lbs.
 77 lbs.
 100 lbs.
 3,970 lbs.
 944 lbs.
 200 lbs.
 1,000 lbs.
 70 lbs.
 2,800 lbs.
 2,125 lbs.
 2,736 lbs.
 179 lbs.
 110 lbs.
 550 lbs.
 1,043 lbs.
 200 lbs.
 80 lbs.
 350 lbs.
 225 lbs.
 179 lbs.
 271 lbs.
 974 lbs.
 210 lbs.
 477 lbs.
 123,864 lbs.

Amine (50%), Water (35%)
 Water (56%), Zinc Nitrate (34%)
 Ethoxylate (39%), Alcohol (25%)
 Sulfated oil (100%)
 Amide (52%), Ester (32%)
 Water (48%), Amide (37%)
 Phosphate (100%)
 Ester (28%), Sulfonate (18.6%)
 Water (38.4%), Phosphate (36.8%)
 Water (43.3%), Ester (23%)
 Water (75%), Resin (15%)
 Zinc Sulfate
 ?
 ?
 Water (78%), Ester (10.7%)
 ?
 Ethoxylate (100%)
 Resin
 Ester (41.8%)
 Mineral oil (70%)
 Amide (60%), Alcohol (31%)
 Water (53.5%), Ester (34%)
 Ethoxylate (60%), Water (33%)
 Mineral oil (74%), Glycol (15%)
 Glycerin (72.9%), Water (20%)
 Mineral oil (93.2%)
 Ethoxylate (29%), Alcohol (25%)
 Ester (28%), Sulfonate (18%)
 Water (80%), Ester (20%)
 Sulfated oil
 Ethoxylate (60%), Water (33%)
 Sulfated oil (70%), Water (29%)
 Water (>43%), Ester (23%)
 Water (48%), Amide (37%)
 Halogenated solvent (40%),
 Ester (40%)

Discarded Stock for 1976

January 1976

Stantex 7416
 A-143 (Stantex P-7527 Ester)
 Standafin U-17
 Stantex WE-567
 Stantex 405-T
 Stantex NSP-857

5,825 lbs.
 9,750 lbs.
 14,000 lbs.
 6,622 lbs.
 28,000 lbs.
 3,657 lbs.
 67,854 lbs.

Water (75%), Ester (12.5%)
 Ester (100%)
 Water (76.8%), Polyethylene (17%)
 Water (>79%), Mineral oil (10%)
 Mineral oil (88%)
 Glycol (81%), Ester (23%)

February 1976

Pyrotex 271 DF Amide	3,977 lbs.	Amide (100%)
Standafin 612	598 lbs.	Water (77%), Amide (20%)
Stansoft S	1,680 lbs.	Water (72%), Amide (19%)
Stantex NSP-857	1,880 lbs.	Glycol (81%), Ester (23%)
Stantex 582	2,660 lbs.	Mineral oil (82%), Ethoxylate (7%)
	<u>10,795 lbs.</u>	

May 1976

Stantex HK-58	4,635 lbs.	Mineral oil (86%)
Stantex 581	28,800 lbs.	Mineral oil (70%)
A-51 (Pegy X-4)	150 lbs.	Ester (100%)
A-86 (Isostearic acid aminoethylethanolamide)	200 lbs.	Amide (100%)
Standapon 95/A-62/A-2	3,999 lbs.	Ethoxylate, fatty acid, mineral oil
T-10/T-22/A-6/G-18/N-4/ A-40/C-13/B-24	1,838 lbs.	Wax, mineral oil, polyethylene
A-116/B-21/C-13/A-33	9,368 lbs.	Amide
	<u>48,990 lbs.</u>	

July 1976

Product W-382	4,190 lbs.	Copolymer
Stanax	1,200 lbs.	Copolymer
	<u>5,390 lbs.</u>	

August 1976

B-24 (Potassium hydroxide 45%)	1,200 lbs.	Caustic
N-4 (Isopar M)	300 lbs.	Mineral oil (100%)
T-42 (Soloid)	8 lbs.	Polymer (100%)
A-56/G-4/B-24	2,512 lbs.	Biodegradable soap (100%)
G-11/B-19/B-20/P-3/B-12	4,368 lbs.	Copolymer (100%)
	<u>8,388 lbs.</u>	

October 1976

Stantex 1695	8,400 lbs.	Mineral oil (49%), Soap (34%)
Stansoft TTS	4,019 lbs.	Water (59%), Ethoxylate (15%)
Stanlev P-4022	58 lbs.	Water (38%), Phosphate (37%)
Zinc Sulfate	700 lbs.	Sulfate (100%)
A-9 (Alfonic 1014-4)	480 lbs.	Ethoxylate (100%)
A-99 (Standafin 471 Ester)	305 lbs.	Ester (100%)
A-68 (Stantex NLW #40 Wax)	415 lbs.	Ester (100%)

A-70 (Petronate K)	400 lbs.	Sulfonate (100%)
A-136 (Pegy X-9)	135 lbs.	Ester (100%)
B-28 (Polyphosphoric acid)	35 lbs.	Acid (100%)
T-12 (Indopol H-300)	561 lbs.	Polybutene (100%)
Dowicide 100	75 lbs.	Preservative (100%)
Amide 2525	200 lbs.	Amide (100%)
A-128 (Hystrene 7022)	160 lbs.	Fatty acid (100%)
	<u>15,943 lbs.</u>	

December 1976

Sanforol 50	210 lbs.	Water (>27%), Sulfonate (44%)
Product A (Material A)	8,044 lbs.	Sulfated oil
Stansoft 4092	10,263 lbs.	Water (>81%), Amide (14.7%)
Stanquest Liquid	1,095 lbs.	Sequestrant
Stantex WE-567	4,050 lbs.	Water (>79%), Mineral oil (10%)
Alfol 8	100 lbs.	Alcohol (100%)
N-14 (Trichloroethylene)	690 lbs.	Halogenated solvent (100%)
Stantex 3-121-F	<u>22,295 lbs.</u>	Phosphate (100%)
	46,747 lbs.	

Discarded Stock for 1977January 1977

A-25 (O.D.A.)	1,315 lbs.	Amide (100%)
Standye Car 240	<u>580 lbs.</u>	Halogenated solvent (50%),
	1,895 lbs.	Ester (30%)

February 1977

A-1 (Ester 673-C)	3,200 lbs.	Ester (100%)
A-44 (Amitex 100%)	1,800 lbs.	Amide (100%)
Pyrotex 271 DF	9,500 lbs.	Water (40%), Amide (25%)
Stantex NSP-857	<u>4,500 lbs.</u>	Glycol (81%), Ester (23%)
	19,000 lbs.	

March 1977

Standye Fix W	430 lbs.	Resin
Stansoft 3214	3,973 lbs.	Water (>47%), Wax (22%)
A-150 (Shellflex 371)	3,360 lbs.	Mineral oil (100%)
A-75 (Grocor #40)	850 lbs.	Fatty acid (100%)
Stantex 405-T	400 lbs.	Mineral oil (88%)
Standafin 42	3,330 lbs.	Water (>40%), Starch (33%)
Standaphos RA-740	4,450 lbs.	Phosphate (100%)

Stantex Scourol #1 Conc.
Stantex 7311
Stantex PFI-6
Stantex B-3009
Standapon 95
Stantex 7311A
Stantex 7367
Standafin B-3044
T-33/B-12/T-2/B-10/B-13/
T-24/T-34/B-12
Stantex MOR Special

Stantex X-1060 Soap
Stantex Finish #10 Soap
Stantex 1910-G Soap
Stantex Soap #1

3,031 lbs.
4,708 lbs.
1,906 lbs.
2,310 lbs.
10,060 lbs.
420 lbs.
369 lbs.
2,090 lbs.

6,055 lbs.
500 lbs.


201 lbs.
1,479 lbs.
22 lbs.
188 lbs.
50,132 lbs.

Amide (100%)
Mineral oil (56%), Ethoxylate (2%)
Phosphate (65%), Wax (15%)
Ester (100%)
Ethoxylate (95%)
Mineral oil (55%), Ethoxylate (3%)
Ester (100%)
Ester (52%), Water (48%)

Starch
Halogenated solvent (41%),
Phosphate (26%)
Biodegradable soap (100%)
Biodegradable soap (100%)
Biodegradable soap (100%)
Biodegradable soap (100%)

Total =

508,175 lbs.


2/22/83

HEINKE CORPORATION

Standard Chemical Charlotte, NC.

DATE	CHEMICAL	PICKED UP		TOTAL	RECYCLED	TOTAL	
		55 GAL. DRUMS		GAL.	55 GAL. DRUMS	RECYCLED	TOTAL DOLLARS
1-20-76	Removal of: Lamp oil, Lamp Emulsion, Antibacterial Solvents	128		7040			10000
6-18-76	" "	160		8800			75000
7-15-76	" "	64		3520			30000
7-22-76	" "	128		7040			60000
10-9-76	" "	96		5280			45000
10-15-76	" "	62		3410			30000
10-27-76	" "	31		1705			15000
11-24-76	" "	96		5280			45000
12-2-76	" "	64		3520			30000
2-9-77	" "	64		3520			30000
2-18-77	" "	31		1705			15000
3-1-77	" "	32		1760			15000
3-2-77	" "	32		1760			15000
3-21-77	" "	32		1760			15000
3-28-77	" "	32		1760			15000
4-15-77	" "	32		1760			15000
4-26-77	" "	32		1760			15000
		1116		61380			525000

Doc #901

05/17/98

15:58

HENKEL HOO LEGAL

008



Henkel Corporation

INTRA-COMPANY
CORRESPONDENCECopy to R. Tuck
D. Vaughn

At

To Joe E. Spearman At

From John E. Clark At

Date 3/24/83


Subject Leonard Chemical Company

On Wednesday, March 23, 1983, Dennis J. Vaughn, Robert Tuck, and the writer visited the Leonard Chemical Company site in York County, South Carolina. We were met at the entrance of the site by Mr. Leonard, who unlocked the gate and allowed all three of us to inspect the site and take photographs, without restrictions of any kind.

Mr. Leonard told us that all but three drums of Henkel's material had been disposed of in the Lancaster, South Carolina landfill. According to Mr. Leonard, whenever he picked up a truckload of drums from Henkel, he would take the drums directly to the Lancaster landfill and empty the contents of the drums into the landfill and then sell the empty drums for 1 to 2 dollars each. All of the disposal was done with the approval of the landfill authorities. The exact details of the arrangement between the Leonard Chemical Company and the Lancaster landfill were not disclosed.

Of the three drums reported by Mr. Leonard to be present on the Leonard Chemical Company site only one was located, which Mr. Leonard referred to as a soap. He had tried to use this material as a detergent for cleaning his hands but gave up on the idea when he found that it didn't do a good job of cleaning. With Mr. Leonard's assistance, the writer sampled the drum and from the appearance, feel, and fatty odor, the material appeared to be a fiber finish soap. However, there were no markings on the drum to identify that the material was from Henkel.

Mr. Leonard told the writer that Henkel was the only one that paid him to haul away waste (\$150.00 per truckload of approximately 30 drums). The other generators allowed him to pick up their waste without charge, which he reclaimed and then sold the reclaimed material (solvents) either back to the generators or on the open market.



Leonard Chemical
11.3

McNAIR LAW FIRM, P. A.

ATTORNEYS AND COUNSELORS AT LAW

NCNS TOWER

1301 GERVAIS STREET

POST OFFICE BOX 11390

COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE (803) 799-9800

FAX (803) 799-9804

CHARLESTON OFFICE
140 EAST BAY STREET
POST OFFICE BOX 1431
CHARLESTON, S.C. 29402
TEL (803) 723-7831
FAX (803) 722-3227

GEORGETOWN OFFICE
1112 HIGHMARKET STREET
POST OFFICE DRAWER 459
GEORGETOWN, S.C. 29442
TEL (803) 546-6131
FAX (803) 546-7232

GEORGETOWN OFFICE
121 SCREVEN STREET
POST OFFICE DRAWER 418
GEORGETOWN, S.C. 29442
TEL (803) 546-6102
FAX (803) 546-0096

RALEIGH OFFICE
ONE EXCHANGE PLAZA
SUITE 810
POST OFFICE BOX 2447
RALEIGH, N.C. 27602
TEL (919) 890-4190
FAX (919) 890-4180

GREENVILLE OFFICE
SUITE 1201
NCNS PLAZA
7 NORTH LAURENS STREET
GREENVILLE, S.C. 29601
TEL (803) 271-4940
FAX (803) 271-4018

HILTON HEAD ISLAND OFFICE
MCNAIR LAW BUILDING
10 POPE AVENUE EXECUTIVE PARK
POST OFFICE DRAWER 7787
HILTON HEAD ISLAND, S.C. 29928
TEL (803) 785-5169
FAX (803) 785-3029

WASHINGTON OFFICE
SUITE 400
MADISON OFFICE BUILDING
1155 15TH STREET, N.W.
WASHINGTON, D.C. 20005
TEL (202) 659-3900
FAX (202) 659-5763

May 9, 1990

Wayne Lee, Esquire
Assistant Regional Counsel
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

RE: Leonard Chemical Company
York County, South Carolina

Dear Mr. Lee:

In response to the General and Special Notice Letter received on April 20, 1990, I am notifying you on behalf of Standard Chemical/Henkel Corporation that we will be represented at the initial meeting on May 10, 1990 at 10:00 a.m. at EPA's regional office in Atlanta. Standard Chemical/Henkel Corporation has been an active participant in the Steering Committee since its inception and intends to continue good faith efforts through the Committee to resolve this matter as expeditiously as possible.

Please direct any further correspondence to me at the following address:

James W. Potter
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211

With kind regard, I am

Sincerely,


James W. Potter

JWP:wb

Leonard Chemical
No. 119
LOT: _____

McNAIR LAW FIRM, P. A.
ATTORNEYS AND COUNSELORS AT LAW

NCNB TOWER

1301 GERVAIS STREET

POST OFFICE BOX 11390

COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE (803) 799-9800

FAX (803) 799-9804

CHARLESTON OFFICE
140 EAST BAY STREET
POST OFFICE BOX 1431
CHARLESTON, S.C. 29402
TEL. (803) 723-7831
FAX (803) 722-3227

GEORGETOWN OFFICE
1112 HIGHMARKET STREET
POST OFFICE DRAWER 459
GEORGETOWN, S.C. 29442
TEL. (803) 546-6131
FAX (803) 546-7232

GEORGETOWN OFFICE
121 SCREVEN STREET
POST OFFICE DRAWER 418
GEORGETOWN, S.C. 29442
TEL. (803) 546-6102
FAX (803) 546-0096

RALEIGH OFFICE
ONE EXCHANGE PLAZA
SUITE 810
POST OFFICE BOX 2447
RALEIGH, N.C. 27602
TEL. (919) 890-4180
FAX (919) 890-4180

GREENVILLE OFFICE
SUITE 1201
NCNB PLAZA
7 NORTH LAURENS STREET
GREENVILLE, S.C. 29601
TEL. (803) 271-4840
FAX (803) 271-4018

HILTON HEAD ISLAND OFFICE
McNAIR LAW BUILDING
10 POPE AVENUE EXECUTIVE PARK
POST OFFICE DRAWER 7787
HILTON HEAD ISLAND, S.C. 29928
TEL. (803) 783-8189
FAX (803) 783-3029

WASHINGTON OFFICE
SUITE 400
MADISON OFFICE BUILDING
1155 18TH STREET, N.W.
WASHINGTON, D.C. 20008
TEL. (202) 658-3800
FAX (202) 658-9763

May 9, 1990

Wayne Lee, Esquire
Assistant Regional Counsel
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

RE: Leonard Chemical Company
York County, South Carolina

Dear Mr. Lee:


In response to the General and Special Notice Letter received on April 20, 1990, I am notifying you on behalf of Standard Chemical/Henkel Corporation that we will be represented at the initial meeting on May 10, 1990 at 10:00 a.m. at EPA's regional office in Atlanta. Standard Chemical/Henkel Corporation has been an active participant in the Steering Committee since its inception and intends to continue good faith efforts through the Committee to resolve this matter as expeditiously as possible.

Please direct any further correspondence to me at the following address:

James W. Potter
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211

With kind regard, I am

Sincerely,



James W. Potter

JWP:wb

Standard Chemical
Charlotte, NC.

Leonard Chemical
11.9

DATE	CHEMICAL	PICKED UP		TOTAL	RECYCLED	TOTAL	TOTAL
		55 GAL. DRUMS		GAL.	55 GAL. DRUMS	RECYCLED GALS.	
1-26-76	Removal of: Isopropylated oils, Isopropyl Emulsions, Nonalkalogenic Solvents		28	7040			60000
6-18-76	" "		160	8100			75000
7-15-76	" "		64	3520			30000
7-22-76	" "		128	7040			60000
10-5-76	" "		96	5280			45000
10-15-76	" "		62	3410			30000
10-27-76	" "		31	1905			15000
11-24-76	" "		96	5280			45000
12-2-76	" "		64	3520			30000
2-9-77	" "		64	3520			30000
2-18-77	" "		31	1765			15000
3-1-77	" "		32	1760			15000
3-2-77	" "		32	1760			15000
3-21-77	" "		32	1760			15000
3-28-77	" "		32	1760			15000
4-15-77	" "		32	1760			15000
4-26-77	" "		32	1760			15000
			1116	61380			525000